



Our ref: DOC21/147091

Senders ref: MP09\_0161 MOD 2

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Planning & Assessments  
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Dear Mr Turner

**Subject:** Wongawilli Mine North West Mains – Proposed Modification (MP09\_0161 MOD 2)

Thank you for your referral dated 4/2/21 requesting comments on the abovementioned major project modification. We understand that the project comprises extension of the approved North West Mains header tunnel by approximately 2.5km, upgrades to existing pit top infrastructure and extension of the mine's life for five years until December 2025.

In response, we provide the following comments:

- One Coastal Upland Swamp, a threatened ecological community listed under the NSW Biodiversity Conservation Act 2016 and Commonwealth Environment Protection & Biodiversity Conservation Act 1999, is proposed to be undermined by the proposed North West mains tunnel extension. The approved mains tunnel undermines one other upland swamp.
- The first workings tunnel proposed by Modification 2 is not predicted to have greater than negligible subsidence at the surface (<20mm). As such, there is not predicted to be surface cracking in bedrock beneath swamps or in streams, meaning it is highly unlikely that the Addendum to NSW Biodiversity Offsets Policy for Major Projects - Upland swamps impacted by longwall mining subsidence ("Swamp Offsets Policy") will be triggered.
- As per the Swamp Offsets Policy, we recommend that no greater than "negligible" impacts to swamps be addressed in conditions of consent, where "negligible" is defined as *"small and unimportant, such as to be not worth considering"*. In the very unlikely event that this standard is exceeded, it is recommended that the Swamp Offsets Policy apply. Similarly, it is highly unlikely that other terrestrial threatened species, including frogs that may be present in overlying streams, will be subject to subsidence impacts.
- The impact on terrestrial biodiversity associated with the pit top works is minimal and will occur in a heavily modified environment. We have reviewed the Biodiversity Development Assessment Report (BDAR) and consider that it satisfactorily assesses the biodiversity impacts associated with the proposal. Under the proviso that the offsets required under the BAM are offset, the BDAR is considered suitable. We remain available to assist with drafting conditions of consent on request.
- The proposed development adjoins the Illawarra Escarpment State Conservation Area (IESCA). No part of the adjacent pit top development should impact upon or occur within the adjoining IESCA. Asset protection zones for the proposed pit top modification works must also be maintained wholly on the subject site, and not encroach into the IESCA.
- We recommend that you consider the Office of Environment and Heritage's (OEH) "Guidelines for developments adjoining land managed by the Office of Environment and

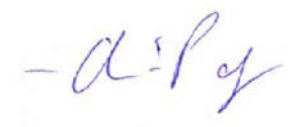
Heritage", including guidance for suggested conditions of consent:

<http://www.environment.nsw.gov.au/research-and-publications/publications-search/guidelines-for-developments-adjoining-land-managed-by-the-office-of-environment-and-heritage>

- Finally, we support the applicant's stated position that no future mining proposals at Wongawilli will comprise longwalls, given the likely subsidence impacts on upland swamps and other sensitive threatened species habitats and watercourses. While noting that the proposed header tunnel is first workings only, we will provide input on any subsequent mining applications utilising the extended tunnel header at such time on merit.

If you have any questions about this advice, please do not hesitate to contact Mr Calvin Houlison, Senior Conservation Planning Officer, via [calvin.houlison@environment.nsw.gov.au](mailto:calvin.houlison@environment.nsw.gov.au) or 4224 4179.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Chris Page".

Chris Page

2 March 2021

**Senior Team Leader, Planning (Illawarra)  
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